

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

CUSTOMS AND TAX ADMINISTRATION OF     MASTER DOCKET  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND     18-md-02865-LAK  
SCHEME LITIGATION

This document relates to:     The cases  
   identified in  
   Appendix A

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**DECLARATION OF DAVID L. GOLDBERG IN OPPOSITION TO PLAINTIFF'S  
MOTION IN LIMINE TO PRECLUDE "EVIDENCE REGARDING NET  
SETTLEMENT"**

I, David L. Goldberg, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner in the law firm of Katten Muchin Rosenman LLP. I am one of the attorneys representing Robert Klugman in the above-captioned action. I submit this declaration in support of Defendants' Memorandum of Law in Opposition to Plaintiff's Motion *in Limine* to Preclude "Evidence Regarding Net Settlement." The facts stated in this declaration are based on my personal knowledge, and if called upon as a witness, I would and could testify competently to them.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the Deposition of Robert Klugman, dated January 28, 2021.

3. Attached as **Exhibit 2** is a true and correct copy of an excerpt from Graham Wade's Expert Report, dated December 31, 2021.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the Deposition of Helen Sorensen, dated September 21, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I executed this declaration on September 3, 2024 in New York, New York.

Dated: New York, New York  
September 3, 2024

/s/ David L. Goldberg  
David L. Goldberg